

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RAMIRO FELIX GONZALES,

*Plaintiff,*

V.

BRYAN COLLIER, Executive Director of the Texas Department of Criminal Justice, BOBBY LUMPKIN, Director of the Texas Department of Criminal Justice–Correctional Institutions Division, and DENNIS CROWLEY, Warden of the Huntsville Unit,  
*Defendants.*

CIVIL ACTION NO. 4:21-CV-00828

## DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

## Exhibit D

## Photographs of Execution Chamber

AFFIDAVIT FOR PROVE-UP OF PHOTOGRAPHS

THE STATE OF TEXAS §

COUNTY OF WALKER §

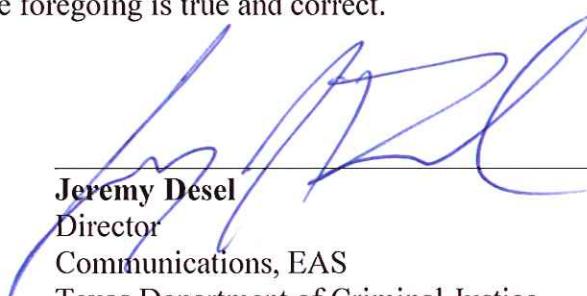
BEFORE ME, the undersigned authority, on this day personally appeared Jeremy Desel, who, being by me duly sworn, deposed as follows:

My name is Jeremy Desel and I am an employee of the Texas Department of Criminal Justice (TDCJ), a governmental agency. I am over 21 years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated.

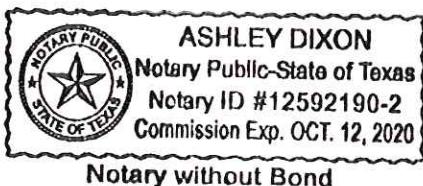
I have personally observed the TDCJ Execution Chamber at the Huntsville Unit on many occasions and am familiar with the layout and proportions. The attached photographs are true and accurate representations of the TDCJ Execution Chamber as it exists today. The photographs depict the gurney in the chamber, the plexiglass windows separating the execution chamber from the two adjacent viewing rooms, and photographs taken from inside the offender witness viewing room looking into the execution chamber. The photograph taken from inside the offender witness viewing room looking into the execution chamber depicts the gurney and the back wall of the execution chamber.

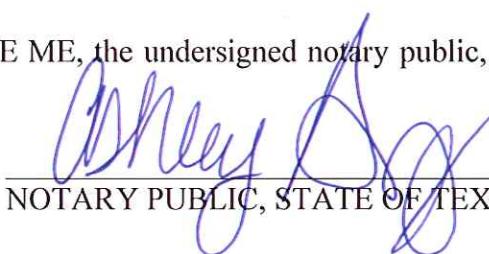
I declare under penalty of perjury that the foregoing is true and correct.

“Further Affiant sayeth not.”

  
Jeremy Desel  
Director  
Communications, EAS  
Texas Department of Criminal Justice

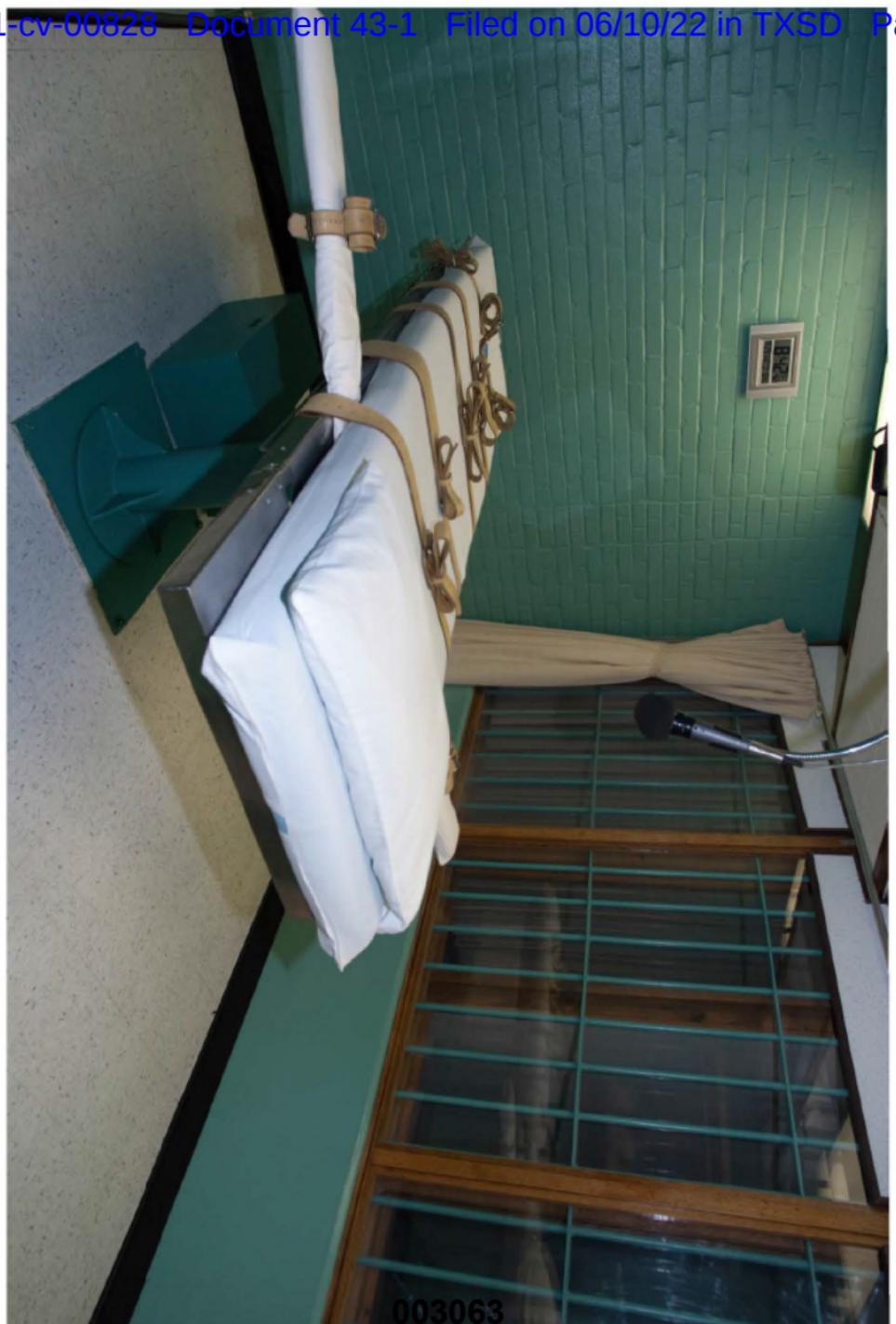
SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned notary public, on the 10th day of July, 2019.



  
NOTARY PUBLIC, STATE OF TEXAS

Ashley Dixon  
Notary's Printed Name

My Commission Expires:  
10/12/2020





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